



## COUNTY OF PLACER

## AGRICULTURAL COMMISSIONER SEALER OF WEIGHTS & MEASURES

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## PLACER COUNTY AGRICULTURE DEPARTMENT

### PESTICIDE USE ENFORCEMENT WORK PLAN

**FY 2006/2007, 2007/2008, and 2008/2009**

Revised January 15, 2008

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#### Resources

##### Personnel

1 Deputy Agricultural Commissioner  
4 Senior Agricultural Inspector positions  
2 Agricultural Inspector I position  
1 Clerical Position

##### Man hours available for the Pesticide Use Enforcement Program

Approximately 3,500 hours are available for pesticide use enforcement each fiscal year.

This includes supervision hours and clerical hours. The Deputy Agricultural Commissioner spends about 25% of annual work hours on pesticide use enforcement (PUE). Two Senior Inspectors are responsible for the majority of staff time spent for pesticide use enforcement activities. The remaining inspectors perform PUE-related activities less than 10% of the time. Clerical support accounts for approximately 15% of that position's annual workload.

**Placer County Department of Agriculture**  
**Pesticide Use Enforcement Work Plan**  
**Page 2**

**Assets**

- Each inspector is assigned a vehicle for exclusive use.
- The department has one computer workstation dedicated for issuing Restricted Materials Permits (RMP) and Operator Identification Numbers (OIN).
- Inspectors have access to the RMP program from their assigned computers.
- One clerical support person has access to the RMP program from her assigned computer.
- All personnel are connected to the Placer County Outlook system and have email access.
- Each staff member has a phone assigned to his/her office space.
- Each inspector is assigned a cell phone for use in the field.
- One inspector utilizes a PC Notebook, supplied by the Automated Inspection and Reporting System (AIRS) program, for field inspections

**Placer County Department of Agriculture  
Pesticide Use Enforcement Work Plan  
Page 3**

**Department PUE Program Overview**

In October 2006, the Placer County Department of Agriculture (PCDA) added a new Agriculture Inspector I to the staff. This inspector's primary duties are in the Weights and Measures program. This has allowed one Senior Inspector to transfer some assigned Weights and Measures duties to the new inspector in order to allocate more time to PUE program. The new inspector is also being trained to perform Pesticide Use Monitoring inspections.

A Senior Inspector has been trained to issue OIN and RMP. This has given the more experienced PUE inspectors additional time for surveillance and field inspections.

In January 2008, another inspector was hired to augment the Weights and Measures program. It is anticipated that over time this inspector will assume some duties from the veteran PUE inspectors, which will increase the amount of time that they can dedicate to PUE. This new inspector will also be trained to perform Pesticide Use Monitoring inspections.

The PCDA intends to increase the amount of use monitoring and pest control records inspections as the additional inspectors become more proficient with their assignments.

Throughout the 2006/2009 fiscal years, the PCDA will continue to assess, monitor and evaluate the core program elements of the Pesticide Use Enforcement program that are identified as priorities by the Department of Pesticide Regulation. Improvements will be made to the program as areas that may need improvement are identified. Staff will familiarize themselves with the Enforcement Program Standards Compendium Volume 3 – Restricted Materials and Permitting.

**Placer County Department of Agriculture**  
**Pesticide Use Enforcement Work Plan**  
**Page 4**

**Restricted Materials Permitting**

The PCDA issues approximately 120 RMP and 225 OIN each year. About one-half of the RMP are issued for production agriculture. Rice growers obtain about half of the production agriculture permits issued. Around one third of production agriculture operations indicate that they have employees, 13 of these operations are based in Placer County.

In 2005, the PCDA installed the Patrick Way Company “AgGIS” program to issue permits, accurately identify site locations and incorporate Geographic Information Systems (GIS) mapping to help evaluate environmental concerns for sites identified on permits. This system has not yet been utilized due to technical difficulties which have not been resolved. The provider of the software has been unavailable to support the system while he is engaged in developing a new version of the program. At this time it is anticipated that the program will be available in September 2008.

**Business Process**

- Currently, RMP and OIN are issued on the Dataflex RMP Program provided by the Department of Pesticide Regulation (DPR)
- RMP for agricultural uses are site and time specific
- RMP and OIN are issued 4 days a week
- Appointments are required to obtain RMP/OIN
  - Accommodations are made for those applicants who are unable to take appointments on regularly scheduled days*
- Only properly licensed Placer County Agricultural Department staff knowledgeable about local conditions issue RMP
- 3 Senior Inspectors primarily issues permits
- RMP are issued in the name of the operator of the property to be treated or their farm name
- RMP are only issued to properly certified applicators
- Candidates for the Private Applicator Certificate (PAC) fill out the required application form and continuing education obtained is documented
- RMP are issued for a calendar year usually expiring on December 31 of the current calendar year
- RMP for rice pesticides receive an expiration date of 1 year from the date of issuance
  - This allows growers to make herbicide applications to uncultivated areas and fallow fields for weed control without having to renew the permit until the next growing season permit conditions are available from DPR*
- Licensed Pest Control Advisers (PCA) and growers indicate that they have considered feasible, reasonable and effective mitigation measures when using pesticides that require a RMP
- Licensed Placer County PUE staff considers and implements feasible alternatives to restricted pesticides when appropriate
- Permits are denied if permittee/applicator qualifications or field settings are not suitable
- Applicants are required to provide a map of the intended application sites

**Restricted Materials Permitting**

**Business Process, Continued**

- Maps must indicate any sensitive areas within ½ mile of the application site
  - Sensitive areas include but are not limited to:
    - Hospitals
    - Schools
    - Parks and playgrounds
    - Residential areas
    - Lakes, waterways, estuaries, reservoirs
    - State wildlife management areas
    - Critical habitat for rare, endangered or threatened species
    - Livestock
    - Crops
- RMP are conditioned to address potential adverse impacts of the application to surrounding sensitive sites such as those listed above
- Permittees are informed that they are responsible for compliance with all RMP conditions
- Previous violations are reviewed and discussed
- Appropriate permit conditions are provided and discussed with the permittee
- Notice of Intent (NOI) requirements are reviewed with the permittee
- The permittee signs for permit conditions
- Applicants are asked if they have employees who are pesticide handlers or field workers
- If applicant has employees, appropriate worker safety requirements are discussed
  - Training forms are provided
  - Pesticide Safety Information Series leaflets are furnished
- Pesticide use report (PUR) requirements are reviewed
- Problems with past pesticide use and reporting violations are discussed
- Appropriate PUR forms are provided to the permittee
- Wellhead protection regulations are discussed with the permittee
- Watershed management information is provided to new permittees
- Dormant spray/surface water runoff requirements are provided when appropriate
- All RMP and OIN are recorded in separate logs when the documents are issued
- The permittee receives copies of all documents issued during the permit process
- RMP/OIN on file at the Placer County Agriculture Department include the current year plus 2 previous years, if applicable

The Placer County Agriculture Department strives to meet all state requirements while making the RMP process as straightforward for the applicant as possible. Time spent issuing RMP depends on the materials the applicant proposes to use and the complexity of the sites listed on the permit. Staff thoroughly explains RMP requirements to applicants. Mitigation alternatives and site specific use practices are discussed and will be documented. Importance of following label and permit conditions is emphasized. Applicant's questions and concerns are addressed.

Applicants are encouraged to contact the department when necessary to ensure that they understand what is required to sustain compliance with requirements. This process takes approximately 1 hour for each permit.

**Restricted Materials Permitting**

**Notices of Intent (NOI)**

- The PCDA reviews NOIs to ensure that they meet all applicable requirements
- NOI are denied or conditioned recognizing and utilizing appropriate mitigation measures for local conditions
- If an NOI is filed for an application that is not made, the original NOI must be cancelled or a negative use report must be filed for that NOI
- NOI are called in to a voicemail line dedicated for that purpose
- Staff can access this line to retrieve messages outside of business hours
- NOI will be taken when submitted in person at the Placer County Agriculture Department
- NOI are not accepted by fax
- A log of each NOI received is updated and maintained by clerical staff  
*The log is available on the common area of the department computer system and can be accessed by all permanent staff*
- A tape recording is made of NOI submitted to verify the accuracy of the written NOI log

**Department Strengths**

- Inspectors who issue RMP have thorough knowledge about permitted sites and surrounding areas
- Staff strives to maintain a cordial, businesslike relationship with permittees
- Staff provides clear, thorough explanation of permit conditions
- Staff spends adequate time to be sure permittees understand their responsibilities
- Permittees are encouraged to contact the department when they have questions about permit conditions and other laws and regulations
- A check list is used when issuing permits to assure that staff provides information on all applicable permit requirements and permittee responsibilities
- A thorough method is used to track RMP issued
- RMP denials are logged
- Licensed staff monitor at least 5% of NOI submitted annually
- Clerical staff is very organized at tracking and recording NOI information. Voicemail messages left on the NOI line are recorded and saved to support hard copies of the NOI log.
- DPR evaluations have shown that the department is addressing regulatory requirements

### **Restricted Materials Permitting**

#### **Department Challenges**

- Limited number of staff trained to issue RMP
- Delays in initiation of AgGIS permit program for map quality and accuracy
- Amount of time needed for staff to become proficient in AgGIS
- Staff time spent issuing RMP takes time away from field activities

#### **2006/2009 Restricted Materials Permitting Program Objectives:**

- Increase the number of staff trained to effectively issue RMP
- Improve RMP map quality and accuracy
- Initial use of the AgGIS permit program to begin in the 2008/2009 fiscal year
- Improve recordkeeping associated with PAC issuance

Approximately 120 RMP and 225 OIN are issued annually. Presently, 3 Senior Inspectors issue RMP and OIN. The PCDA plans to train additional inspectors in this process as workload allows.

When PAC are issued or renewed they are logged in a binder. This system makes it difficult to determine when a PAC was issued or expires without searching expired permit files. A review of existing PAC numbers issued has shown that some numbers have been duplicated. The PCDA has created a new numbering system and is in the process of assigning new numbers as PACs come up for renewal. These new numbers will be entered in a computer file that will be more user friendly and will make tracking of expiration dates more efficient.

When the AgGIS 3 program is installed all inspectors who issue OIN and RMP will be trained to use the program. This program will greatly enhance quality and accuracy of the maps of permitted sites. At present, permittees provide maps that show the area to be treated, any residences, wellheads and water areas on the property, and include any sensitive areas within ½ mile of the site. The issuing inspector then makes a copy of the map book page that corresponds to the location of the site and highlights the area on the copied map.

#### **Deliverables**

- Increase the number of staff trained to issue RMP and OIN
- RMP support inspector(s) will be trained in all areas of the permit issuance process and NOI evaluation
- Improve the PAC tracking system



**Placer County Department of Agriculture  
Pesticide Use Enforcement Work Plan  
Page 8**

**Restricted Materials Permitting**

**Deliverables, Continued**

- Use of the Patrick Way Company “AgGIS” program will begin
- The PCDA will provide initial training on operation of the AgGIS program to the inspectors assigned to issue the majority of RMP/OIN.
- Trained inspectors will work with other staff members to familiarize them with the AgGIS program, so they may provide support for the RMP/OIN process
- Time to issue permits on AgGIS system should take approximately the same amount of time as when using the current Dataflex program

**Success Criteria**

- Number of staff trained to issue RMP and OIN  
*At least 3 staff members able to accurately and efficiently issue permits.*
- Meeting all requirements for permit issuance prescribed by law and DPR policy
- Training on AgGIS program begins
- The amount of time taken to issue RMP on the AgGIS program  
*The average amount of time spent to issue a RMP should be approximately 1 hour. It may take longer when using the new program until staff is familiar with its operation.*

**Placer County Department of Agriculture**  
**Pesticide Use Enforcement Work Plan**  
**Page 9**

**Site Monitoring Plan**

Rice pesticide applications account for about 20% of the NOIs received by the PCDA. These proposed applications require the most scrutiny due to water quality issues associated with applications of Ordram and Bolero, and potential for crop damage from Clincher and Propanil applications. The number of NOIs for rice herbicides varies year to year depending on weather, availability and cost of water, and the economy.

The majority of other NOIs submitted are for non-agricultural applications of phenoxy herbicides, aluminum phosphide and zinc phosphide for rodent control.

Approximately 10% of the NOIs received are for phenoxy herbicides to be applied to sites other than rice. Of these, about ½ of the applications are intended for agriculture production. The rest are for applications to golf courses, parks, residential and business landscapes. The PCDA allows the NOI for non-agricultural applications of these materials to be waived once a company has been inspected applying the materials with no violations found.

Aluminum phosphide applications account for around 25% of NOIs received. Nearly ¼ of these applications are for rodent control at golf courses and cemeteries. The remainder of these NOIs are intended for applications to residential and business landscapes. Zinc phosphide is applied for rodent control on under 10% of the sites submitted in NOIs. The majority of these applications target voles in a residential development located on former grazing land. Strychnine applications are minimal.

Aluminum phosphide applications must be approved by site. Once a non-agricultural site has been approved, a pre-application site inspection is waived for subsequent applications if there are no changes to the surrounding environment. An NOI is still required to be submitted for these sites. Agricultural use of aluminum phosphide is subject to all RMP requirements including pre-application inspection.

Manex applications make up about 10% of the NOIs submitted. The majority of the material is applied to 2 large walnut production operations.

One wholesale production nursery accounts for most of the field fumigation activities in Placer County. Telone® is mainly applied to these fields. The nursery is located in an isolated area with a limited residential population nearby. The fumigation activities are performed by a reputable licensed pest control business. The PCDA works closely with the grower and monitors these applications as needed. Occasionally a small strawberry producer will obtain a RMP for methyl bromide. A pre-application inspection is performed when the NOI is received and each of these applications is inspected. These applications account for fewer than 3% of NOIs.

About 10% of the NOIs are for structural applications of Vikane.

In the 2006/2009 fiscal years, pre-application site inspections will be performed on a minimum of 5% of NOI received. The PCDA strives to monitor a larger percentage of the NOIs received as workload allows.

**Site Monitoring Plan, Continued**

**Sites to be monitored are determined by:**

- Hazards of pesticides to be applied
- Applicator compliance history
- Application Method
- Site to be treated
- Weather Conditions
- Crop
- Surrounding Environment
- Pest Control Adviser Recommendation

**Priorities are set by:**

- Toxicity/risk of the material to be applied
- Potential of application to cause adverse health or environmental effects
- Potential to negatively impact persons/property not associated with the application
- Worker Safety issues
- Risks posed by the method of application
- Compliance history of grower, applicator, pest control adviser
- Weather conditions at time of proposed application

The PCDA NOI log distinguishes proposed agricultural use applications from non-agricultural use. The log indicates when a pre-application inspection was performed on an individual site. Every site identified in each NOI submitted is recorded on a separate line in order to maintain an accurate count of sites.

**Department Strengths**

- An accurate system is established for recording NOI received
- PUE staff is knowledgeable about site conditions and environmental changes that occur near permitted sites
- Staff is well aware of risks associated with frequently used restricted materials

**Department Challenges**

- Limited number of staff familiar with NOI recordkeeping and evaluation
- Limited number of staff knowledgeable with rice pesticide program
- Time required to train more staff to be competent with NOI and rice pesticide program activities

**Site Monitoring Plan, Continued**

**2006/2009 Site Monitoring Plan Objective**

- Increase the number of staff trained to evaluate NOI in order to sustain our commitment to protect pesticide handlers, field workers, county residents, the local environment and crops/livestock from adverse impacts of pesticide use.
- Maintain a site monitoring plan that regards the reduction of hazard to sensitive areas such as agricultural/urban interface, water bodies, ground water protection areas, habitats of rare, endangered and threatened species.
- Train additional staff in pesticide use monitoring activities to act as support for regular field personnel.
- Schedule seasonal assessment of the program to identify any adjustments that may be required.

**Deliverables**

- Increase number of staff trained to act as support for NOI evaluations and rice pesticide program
- Continue to review each NOI to ensure all requirements are met for the proposed applications
- Differentiate agricultural from non-agricultural NOI submitted to the department
- Each field referenced in messages received for notice of intent to apply restricted materials will be counted as a separate NOI
- Continue to monitor rice pesticide applications to ensure compliance with worker safety and environmental protection requirements, permit conditions and pesticide label statements
- Regularly conduct and document rice field water hold and seepage inspections to assure no illegal releases occur
- Closely monitor ground water protection areas (GWPA) to ensure that any application of Title 3, California Code of Regulations (3 CCR) section 6800(a) materials are permitted and made compliance with regulations
- Continue to monitor a minimum of 5% of agriculture/urban NOI to assure compliance with permit conditions
- Evaluate areas of new urban growth to determine risk associated with agricultural pesticide applications

### Success Criteria

- Continued prevention of adverse episodes through proactive monitoring of proposed RMP applications
- Pre-application inspections performed on at least 5% of NOI received  
*More will be performed if overall workload allows*
- Compliance rate for rice water holding requirements
- Rate of compliance with GWPA regulations
- All proposed applications are properly permitted and meet permit conditions
- Identification of all agricultural use NOI received by field is maintained

**Placer County Department of Agriculture**  
**Pesticide Use Enforcement Work Plan**  
**Page 13**

**Compliance Monitoring**

During the 2006/2007 fiscal year, the PCDA performed the following inspections:

- 7 property operator applications
- 35 agricultural pest control business (PCB) applications  
(*Figure includes unlicensed businesses*)
- 4 structural PCB applications
- 3 agricultural PCB mix/load
- 3 property operator mix/load
- 2 field fumigation applications
- 6 property operator headquarter audits
- 5 agricultural PCB headquarter audits
- 3 agricultural PCB record audits
- 2 structural PCB headquarter/record audits
- 10 Pest Control Dealer audits

Surveillance activities are consistent with previous years. About 80% of the agricultural use monitoring inspections are targeted from NOI received. The remaining 20% are generated from surveillance activities. Non-agricultural applications are found during surveillance. About 50% of the time areas where known pesticide use occurs are targeted for surveillance. The balance is randomly found during other inspection activities. Surveillance hours outside regular office hours is performed.

The PCDA continues to target unlicensed maintenance gardener businesses. These applicators are usually found on a random basis. Outreach activities are performed in an attempt to increase the number of these enterprises that obtain pest control business licenses. Flyers with licensing information are distributed. Local agencies that issue business licenses have been provided with pest control licensing information. Business license applicants who indicate that they intend to operate gardening or landscape operations are given pest control business license information.

PCB registrations, OIN and RMP issued have been assessed to identify operations that should receive higher priority for headquarter and record inspections. There are 32 businesses and agencies based in the county that have employees and obtain RMP. Golf courses account for the majority of operations that possess RMP and employ workers. Of the growers based in Placer County, 13 have RMP and employees. Wholesale nurseries account for the majority of agricultural production operations with employees. These operations are known to have good compliance records. A total of 84 other operations have employees.

**Compliance Monitoring**

**Department Strengths**

- Deputy Agricultural Commissioner is a veteran PUE inspector and employs a proactive approach to gain compliance with program requirements
- 2 PUE inspectors are adept in enforcement of the program and actively supported less experienced inspectors
- PUE staff is well versed in DPR pesticide use laws, regulations and policies
- Staff performs thorough inspections
- Staff is professional and courteous when performing inspections

**Department Challenges**

- Very limited PUE staff for a county that covers a large geographic area
- Areas of county that have pest control activities that are a significant distance from department base, such as Lake Tahoe
- Monitoring applications performed by small growers and golf courses that do not require NOI and are performed outside of normal office hours

**2006/2009 Inspection Monitoring Plan Objective**

The PCDA will train additional staff to perform PUE inspections to enhance surveillance activities. Surveillance will be periodically scheduled outside of regular office hours and in the more remote areas of the county. The support staff will also be introduced to the rice pesticide program activities.

The PCDA will continue to maintain a high level of scrutiny over the rice pesticide program. Applications of these pesticides are generally made by air and have the most potential to cause adverse effects.

Very few highly toxic pesticides are used in Placer County. Operations that have a higher degree of risk associated with their pesticide use practices will be targeted for more frequent inspections.

Pesticide users who possess RMP and who have employees will receive first priority for records inspections. The next priority will be given to those operations that employ pesticide handlers and field workers but do not use restricted materials. Operations where pesticides are applied only by the owner or grower will be inspected on a rotating basis. Of these operations, those who possess RMP and those that receive violations will receive precedence for records inspections.

The department holds an annual outreach to inform licensees and other applicators about changes in pesticide use requirements. These classes also provide a reminder that compliance is a requirement, not an option. Continuing education units are provided for PAC (Private

Applicator Certificate), QAC (Qualified Applicator Certificate), QAL (Qualified Applicator License), and PCA (Pest Control Adviser) license holders.

**Placer County Department of Agriculture**  
**Pesticide Use Enforcement Work Plan**  
**Page 15**

**Compliance Monitoring**

**Deliverables**

- Continue to perform surveillance and application inspections as in past years
- Target some surveillance in more remote areas of county, such as Lake Tahoe
- Establish a come-up file for re-inspections
- Perform re-inspections in a timely manner
- Perform more frequent inspections of those operations with a greater degree of non-compliance
- Inspect 20% of operations with RMP and employees each year
- Inspect 15% of operations with employees, but no RMP, annually
- In the 2006/2009 fiscal years perform:
  - 20 PCB pesticide application inspections
  - 3 agricultural PCB mix/load inspections
  - 5 property operator application inspections
  - 2 property operator mix/load inspections
  - 2 field worker inspections
  - Perform a follow-up records inspection on Placer County-based operations when violations are found during use monitoring inspection
  - Inspect each licensed pest control dealer once

*The numbers stated for mix/load inspections will depend on activities found during field surveillance. The only way to guarantee that the total number of inspections projected in the work plan will be completed is by making appointments with applicators. The PCDA believes that this does not accurately represent compliance as the applicator is then forewarned of the inspection.*

**Success Criteria**

- Continued surveillance with some performed outside regular office hours and in remote areas
- Number of use monitoring inspections completed
- Number of records inspections performed
- Come-up file established
- Come-up file improves re-inspection timing
- Records/headquarters follow-up performed when use monitoring inspections identify violations



### **Compliance Monitoring**

#### **Investigation Response**

The PCDA has an investigation log that is utilized when Doctor's First Reports are received from DPR. The log is also used to track complaints received and other non-illness investigations.

The PCDA responds to pesticide damage/exposure calls the day they are received. The majority of incidents logged are resolved within the 120-day period allowed by DPR. When an investigation is not completed within the allotted time frame it is usually due to difficulty contacting the complainant or timely receipt of evidence from the complainant. DPR is notified when a report will be delayed.

The PCDA will strive to submit Pesticide Episode Incident Report (PEIR) to DPR within the required timeframe by establishing a peer review process. Inspectors will proof read one another's reports to identify errors before the report is submitted to management. By doing so, the time taken for management review will be reduced.

PEIR will be submitted to DPR when they are approved by PCDA management and will not be held back until any compliance/enforcement action has been completed.

#### **Department Strengths**

- Staff thoroughly investigates each pesticide episode promptly
- Investigation reports contain proper information and are well written
- No investigation reports have been returned by DPR for correction

#### **Department Challenges**

- Increasing number of calls regarding neighbor disputes that allege pesticide misuse with no direct evidence available

#### **2006/2009 Investigation Response Objective**

The PCDA will initiate all priority episodes immediately, formulate an investigation plan and will submit a preliminary report to DPR within 15 days. The PCDA will begin and complete all non-priority investigations involving pesticides in a timely manner. PCDA will notify DPR if an investigation report cannot be completed within 120 days. All reports will be thorough and include a discussion of all suspected and causal violations discovered during the investigation.

**Compliance Monitoring**

**Investigation Response Objective, Continued:**

**Deliverables**

- Continued tracking of pesticide episodes
- Pesticide Episode Incident Report (PEIR) prepared for all episodes involving pesticides
- Timely initiation and completion of all priority and non-priority investigations
- Develop and use of investigation plan as outlined in the DPR Investigation Procedures Manual
- Thorough report preparation
- Timely submission of PEIR to DPR

**Success Criteria**

- Accurate tracking of all investigations reported to the Placer County Agriculture Department
- Investigations begin in a timely manner
- Preliminary update on priority investigations submitted to DPR within 15 days
- Investigation plans completed and followed
- Thorough investigation reports
- Complete reports in a timely manner as required by DPR

**Placer County Department of Agriculture  
Pesticide Use Enforcement Work Plan  
Page 18**

**Enforcement Response**

The Placer County Agriculture Department adheres to a strong, progressive enforcement response policy. When violations are found during inspections/investigations, staff thoroughly documents non-compliances. Staff discusses violations with the Deputy Agricultural Commissioner. Staff then prepares Agricultural Civil Penalty (ACP), Notice of Violation (NOV), and other reports and submits them to the Deputy Agricultural Commissioner for review. Once approved, compliance actions are sent by certified mail to the respondent. ACPs are submitted to the Agricultural Commissioner for approval and signature.

A log of all compliance/enforcement actions is maintained to track violations and response.

All label, PPE and container control violations receive an ACP for the first violation. Other violations receive appropriate compliance/enforcement response in accordance with the Enforcement Response Regulations. Fine Guidelines are applied in accordance with 3 CCR section 6130.

Ideally, compliance/enforcement actions are to be sent out within 60 days. However, other workload considerations often prevent the department from meeting this goal. Staff communicates with the business/agency management that receive violations when the violations occur and again when the compliance/enforcement documents are sent. Few companies/agencies receive repeat violations because they have improved their practices.

Placer County Agriculture Department staff consistently communicates with management about violations and other concerns however regular PUE staff meetings are not conducted.

**Department Strengths**

- Professional, competent, well-trained enforcement staff
- Excellent communication of reasons for violations by staff to pesticide user
- Strong enforcement policies

**Department Challenges**

- Limited PUE staff with additional workload in various department programs
- Maintaining a timely response to PUE issues while performing other assigned duties

**2006/2009 Enforcement Response Objectives**

The PCDA will maintain our consistent, progressive compliance/enforcement response to documented violations. The department will increase the efficiency and time frame in which the actions are prepared and reviewed through a peer review process before enforcement actions are

**2006/2009 Enforcement Response Objectives, Continued**

submitted to management for approval. DPR will work with PCDA inspectors on up to 4 oversight inspections with the PCDA during the fiscal year to evaluate the quality of county inspections.

**Deliverables:**

- Apply Enforcement Guidelines fairly
- Apply Fine Guidelines in accordance with regulations
- Progressive enforcement
- Initiate a timely response to violations
- Staff to submit actions for peer review before submitting to management
- Management review process to be completed as soon as workload allows
- Schedule periodic PUE staff meetings to communicate and discuss violations, problem areas, and policies
- Work with DPR on up to four oversight inspections

**Measure Success:**

- Shorten time frame to process enforcement actions to 120 days
- Continue to apply Enforcement Guidelines fairly
- Hold PUE staff meetings every 3 – 4 months as total workload allows
- Number of oversight inspections with DPR